

JOEL R. SPIVACK, ESQUIRE
LAW OFFICE OF JOEL R. SPIVACK
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CHERRY HILL, NEW JERSEY 08034
(856) 488-1200
COUNSEL FOR DEBTOR

IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In the Matter of:	}	
	}	Case No. 21-17001-ABA
Frank V. Federico, Jr. & Cathy J. Federico	}	
	}	Chapter 13
Debtor(s)	}	

**AMENDED NOTICE OF DEBTOR'S MOTION TO APPROVE LOAN
MODIFICATION**

TO:

Andrew B. Finberg
Chapter 13 Standing Trustee
Cherry Tree Corporate Center
535 Route 38, Suite 580
Cherry Hill, NJ 08002
Trustee

Frank V. Federico, Jr. & Cathy J. Federico
7417 Rudderow Avenue
Pennsauken, NJ 08109
Debtor

ALL CREDITORS ON MATRIX

PLEASE TAKE NOTICE that on _____, or as soon thereafter as counsel may be heard, the Law Office of Joel R. Spivack, Esquire, attorneys for Frank V. Federico, Jr. & Cathy J. Federico, the within debtor ("Debtor"), shall move before the Honorable Andrew B. Altenburg, Jr., United States Bankruptcy Judge, at the United States Bankruptcy Court, 401 Market Street, 2nd Floor, 4B, PO Box 2067, Camden, NJ 08101, for an **Order Approving Loan Modification**.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying Certification of Debtor in Support of **Motion To Approve Loan Modification**. A proposed form of Order is also being submitted. A

memorandum of law has not been submitted because the issues raised by the Motion are not extraordinary or unusual necessitating the filing of legal briefs.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) specify with particularity the basis of the objection; and (iii) be filed with the Clerk, United States Bankruptcy Court, 401 Market Street, 2nd Floor, 4C, PO Box 2067, Camden, NJ 08101 and simultaneously served on Debtors' counsel, Law Office of Joel R. Spivack, 1415 Marlton Pike East, Suite 302, Cherry Hill, NJ 08034 (Attention: Joel R. Spivack, Esq.) **no later than December 17, 2024. In the event an objection is not timely filed, a hearing will not be held.**

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed and served, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a) and the relief requested may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that counsel hereby requests oral argument in accordance with D.N.J. LBR 9013-1 (f) in the event opposition papers are timely filed.

Dated: December 6, 2024

LAW OFFICE OF JOEL R. SPIVACK

By: /s/ Joel R. Spivack, Esquire
Joel R. Spivack, Esquire